IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

KENNETH PRITCHARD,

Plaintiff,

v.

Civil Action No. 1:18-cv-1432-AJT-TCB

METROPOLITAN WASHINGTON AIRPORTS AUTHORITY

Defendant.

<u>DEFENDANT METROPOLITAN WASHINGTON AIRPORTS AUTHORITY'S</u> <u>MOTION TO DISMISS PLAINTIFF'S COMPLAINT</u>

COMES NOW Defendant Metropolitan Washington Airports Authority ("Airports Authority"), by counsel, pursuant to Fed. R. Civ. P. 12(b)(6), and moves to dismiss Plaintiff Kenneth Pritchard's Complaint for failure to state a claim upon which relief can be granted.

As further support for this Motion, the Airports Authority attaches its Memorandum of Points and Authorities incorporated herein as if set forth in full.

WHEREFORE, given the above good and valid reasons, and those reasons articulated in the attached Memorandum of Points and Authorities, Defendant Airports Authority respectfully requests that this Court grant its Motion to Dismiss, and dismiss Plaintiff's Complaint against it with prejudice.

Respectfully Submitted,

FRIEDLANDER MISLER, PLLC

/s/ Joseph W. Santini

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Attorney for Defendant Metropolitan Washington Airports Authority

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the 1st day of March 2019, I sent the above Motion to

Dismiss via the Court's electronic case filing system to:

James M. Eisenmann, Esq. Nina Y. Ren, Esq. KALIJARVI, CHUZI, NEWMAN & FITCH, P.C. 818 Connecticut Ave., NW, Suite 1000 Washington, D.C. 20006

/s/ Joseph W. Santini

Joseph W. Santini